

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

Don Springmeyer

Nevada Bar No. 1021

Bradley S. Schrager

Nevada Bar No. 10217

Justin C. Jones

Nevada Bar No. 8519

3556 E. Russell Road, Second Floor

Las Vegas, Nevada 89120

(702) 341-5200/Fax: (702) 341-5300

dspringmeyer@wrslawyers.com

bschrager@wrslawyers.com

jjones@wrslawyers.com

(Additional counsel appear on signature page)

Attorneys for Individual and Representative Plaintiffs

Cung Le, Nathan Quarry, Jon Fitch, Luis Javier

Vazquez, Brandon Vera, and Kyle Kingsbury

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-(PAL)

**NOTICE RE: CONSOLIDATED AMENDED
ANTITRUST CLASS ACTION COMPLAINT**

DEMAND FOR JURY TRIAL

Plaintiffs provide this Notice to clarify the following concerning the contemporaneously-filed Consolidated Amended Antitrust Class Action Complaint (“CAC”), Dkt. No. 208:

1. On November 19, 2015, the Parties submitted a Stipulation to File a Consolidated Complaint and to Extend Zuffa LLC’s Deadline to Answer Plaintiffs’ Consolidated Complaint Accordingly (“Stipulation”), Dkt. No. 202;

1 2. The Stipulation provided that the CAC would not contain any substantive changes to the
2 allegations of the last filed complaint;

3 3. The Stipulation further provided that Plaintiffs may reduce the total number of proposed
4 representative plaintiffs;

5 4. On November 20, 2015, Magistrate Judge Peggy A. Leen granted the Stipulation, Dkt.
6 No. 204;

7 5. In accordance with the Stipulation, the contemporaneously filed CAC does not contain
8 any substantive changes to the allegations of the last filed complaint;

9 6. The only changes in the CAC are that the former proposed class representative plaintiffs
10 Pablo Garza, Gabe Ruediger, Darren Uyenoyama, Dennis Lloyd Hallman and Mac Danzig are not
11 included as proposed representative plaintiffs.

12 ///

14 ///

16 ///

18 ///

20 ///

22 ///

24 ///

26 ///

28 ///

7. Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury are identified in the CAC as proposed class representative plaintiffs.

Dated: December 18, 2015

Respectfully Submitted,

By: /s/ Don Springmeyer

Don Springmeyer (Nevada Bar No. 1021)

Bradley S. Schrager (Nevada Bar No. 10217)

Justin C. Jones (Nevada Bar No. 8519)

WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP

3556 E. Russell Road, Second Floor

Las Vegas, Nevada 89120

(702) 341-5200/Fax: (702) 341-5300

dspringmeyer@wrslawyers.com

bschrager@wrslawyers.com

jjones@wrslawyers.com

Co-Lead Class Counsel:

Eric L. Cramer (*Pro Hac Vice*)

Michael Dell'Angelo (*Pro Hac Vice*)

Patrick F. Madden (*Pro Hac Vice*)

BERGER & MONTAGUE, P.C.

1622 Locust Street

Philadelphia, PA 19103

Telephone: (215) 875-3000

Facsimile: (215) 875-4604

ecramer@bm.net

mdellangelo@bm.net

pmadden@bm.net

Joseph R. Saveri (*Pro Hac Vice*)
Joshua P. Davis (*Pro Hac Vice*)
Matthew S. Weiler (*Pro Hac Vice*)
Kevin E. Rayhill (*Pro Hac Vice*)
JOSEPH SAVERI LAW FIRM, INC.
505 Montgomery Street, Suite 625
San Francisco, California 94111
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
mweiler@saverilawfirm.com
krayhill@saverilawfirm.com

Benjamin D. Brown (*Pro Hac Vice*)
Richard A. Koffman (*Pro Hac Vice*)
Hiba Hafiz (*Pro Hac Vice*)
COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W., Suite 500, East Tower
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408 4699
bbrown@cohenmilstein.com
rkoffman@cohenmilstein.com
hhafiz@cohenmilstein.com

Additional Counsel for the Classes:

Robert C. Maysey (*Pro Hac Vice*)
Jerome K. Elwell (*Pro Hac Vice*)
WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: (602) 264-7101
Facsimile: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

Jeffrey J. Corrigan (*Pro Hac Vice*)
William G. Caldes (*Pro Hac Vice*)
SPECTOR ROSEMAN KODROFF & WILLIS, P.C.
1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611
jcorrigan@srkw-law.com
bcaldes@srkw-law.com

Frederick S. Schwartz (*Pro Hac Vice*)
LAW OFFICE OF FREDERICK S. SCHWARTZ
15303 Ventura Boulevard, #1040
Sherman Oaks, CA 91403
Telephone: (818) 986-2407
Facsimile: (818) 995-4124
fred@fredschwartzlaw.com

*Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
Luis Javier Vazquez, and Kyle Kingsbury*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December, 2015, a true and correct copy of
the **NOTICE RE: CONSOLIDATED AMENDED ANTITRUST CLASS ACTION**
COMPLAINT was served via the United States District Court CM/ECF system on all parties or
persons requiring notice.

By /s/ Christie Rehfeld
Christie Rehfeld, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP